



Agenda

- Introduction and Overview
 - General Requirements
 - What's New
- Reporting Requirements
- Verification Requirements
- Electric Power Sector Requirements
- Technical Discussion on Power Attribution Methods

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Goals of Reporting Program

- Consistency with other programs and involvement with Western states efforts
- Rigorous and well defined emissions estimation methods
- Report all gases where methods available
- Include verification and ensure sufficient number of qualified verifiers
- Create bottom-up inventory to track trends and support emission reduction strategies

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Key Proposals

- Facility-based reporting
 - Cement Plants, Power Plants, Cogeneration, Refineries, Hydrogen Plants, Large Combustion
- Broader requirements for Electric Power Sector
 - Retail Providers, Marketers
- Third Party Verification
 - Annual or triennial as specified

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Key Proposals

- Report specified stationary combustion, process, fugitive emissions
- Report fuel use, indirect energy use
- Electricity transactions in power sector
- Six Kyoto gases as required
- Fuel testing, default factors, emissions monitoring specified by sector and process

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Key Issues Across Sectors

- Phase-in
- Sufficient third party verifiers
- Entity reporting
- De minimis emissions
- Mobile sources
- Default emission factors

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Key Issue: Phase-in

- Reporting still begins in 2009
- Verification begins in 2010
- First reports can use best available emissions information
- 2010 and future reports must use methods specified in regulation

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Key Issue: Sufficient Verifiers

- Welcome air districts and private consultants to act as verifiers
- Provides larger pool of qualified verifiers
- Provides choice to operators
- Third-party verifiers are consistent with existing GHG programs

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Key Issue: Entity Reporting

- Reporting by facility operators
- Includes contact information for other facilities under common ownership
 - May be separate submittal by entity
- Whole-entity footprint report will be an option in reporting tool

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Key Issue: De Minimis

- Proposal allows designation of small discrete sources as de minimis
- Up to 3 percent of facility CO₂e emissions, not to exceed 10,000 MT
- Emissions are still reported but may be estimated through simpler methods

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Key Issue: Mobile Sources

- Reporting is optional at facility level
- CCAR method provided for any facility opting to include mobile sources
- Expected for optional entity reporting
- Will look at mobile source reporting needs in context of scoping plan

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Key Issue: Default Factors

- Appendix A provides default factors where use is specified
- Option to develop source-specific emission factors
- Any source for CH₄ and N₂O
- Biomass, solid waste, geothermal for CO₂

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Participation Information

- Workshop materials:
<http://www.arb.ca.gov/cc/ccei/ccei.htm>
- Staff Report
(includes proposed Regulation):
<http://www.arb.ca.gov/regact/2007/GHG2007/GHG2007.htm>
- Webcast information:
<http://www.calepa.ca.gov/broadcast/>
- Email comments during webcast:
auditorium@calepa.ca.gov

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Regulatory Proposal and General Requirements

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Reporting Statutory Requirements



- Regulation for reporting and verification by January 1, 2008
- Begin with sources contributing the most to statewide emissions
- Account for all electricity consumed, including imports
- Use CCAR protocols as appropriate

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How We Got Here

- Continuing stakeholder involvement in ARB process
- 4 previous workshops
- 15 technical discussions
- Numerous meetings and teleconferences
- Coordination with State agencies
- Coordination with California Climate Action Registry

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Since August 15 Workshop

- Received over 80 comment letters and emails on the August 10 preliminary draft regulation
- Worked to address many stakeholder concerns, incorporate changes
- Addressed additional issues from public process in staff report

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The Regulatory Process

- Staff proposal released for formal 45 day comment period on October 19
- Collect comments on proposed regulation
- Board Hearing December 6 to receive public testimony and consider staff proposal
- Board deliberates and accepts, modifies, or rejects proposal

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Submitting Comments

- We are in formal 45 day comment period (October 19 – December 5)
- **Strongly recommend** electronic submittal
 - Via <http://www.arb.ca.gov/regact/2007/ghg2007/ghg2007.htm>
 - Includes mechanism for providing attachments
- See hearing notice for additional options:
 - <http://www.arb.ca.gov/regact/2007/ghg2007/ghgnotice.pdf>

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GHG Reporting Process

- Reporting
 - Operator submits required data to ARB each year by reporting deadline
- Verification
 - Verification team conducts verification when required and submits:
 - Detailed verification report to operator
 - Verification opinion to operator and ARB by verification deadline

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Regulation Organization

- Applicability – Who has to report
- Subarticle 1 – General Requirements
 - Definitions
 - General reporting requirements
 - Reporting and verification schedule
 - Record keeping, confidentiality, enforcement
- Subarticle 2 – Sector Specific Requirements
 - Cement, electric generating, retail providers, cogeneration, refineries, hydrogen plants, large stationary combustion sources

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Regulation Organization (continued)

- Subarticle 3 – Calculation Methods for Multiple Sectors
 - CO₂ emissions from combustion using emission factors, heat content, carbon content, CEMS, etc.
 - CH₄ and N₂O emissions
 - Indirect energy use
- Subarticle 4 – Verification Requirements
- Appendix – Compendium of Emission Factors for reporting

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Reporting: General Requirements (§95103(a))

- Annual reporting for each facility or entity subject to regulation
- The operator -- party with “operational control” – has reporting responsibility
- Report emissions for specified facility sources and gases by fuel type
 - Additional data as specified



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Applicability (§95101):

- Cement plants
- Oil refineries
- Hydrogen plants ≥ 25,000 MT CO₂/yr
- Electric generating facilities and electric retail providers
- Cogeneration facilities
- Stationary combustion sources emitting ≥ 25,000 MT CO₂/yr

94% of point source CO₂ emissions



Changes to August 10 Draft – Applicability (§95101) –

- Electric power marketers would also report
- Electric generating facilities or cogeneration facilities report if ≥ 1 MW and emit $\geq 2,500$ tons CO₂
- Reporting not required for backup or emergency generators
 - As designated in Air District permit
- Reporting not required for “portable equipment” (as defined in CA Code of Regulations)

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Changes to August 10 Draft – Schedule –

- Provide first year phase-in period
 - Submit estimates of 2008 emissions in 2009
 - Facilities may use “best available data” for 2008 estimates
 - No verification requirement for 2009 submittal
 - 2010 and future reports must use methods specified in regulation
- Schedule changes
 - Reporting required earlier in year (April or June)
 - More time provided for verification (6 mos.)

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Reporting and Verification Schedules (§95103(b)-(c))



- General stationary combustion, electric generating and cogeneration facilities not operated by other reporters
 - Emissions reports due by April 1
 - Verification complete by October 1
- Retail providers; other facilities
 - Emissions reports due by June 1
 - Verification complete by December 1

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Changes to August 10 Draft – Additions –

- Fuel analysis data capture, measurement requirements (§95103(a)(8)-(9))
- Choose fuel-based or CEMS method and stay with it (§95103(a)(10))
 - New CEMS for reporting to be operational by Jan 2010
- Options to develop source-specific emission factors under supervision of air districts or ARB (§95125(b), (h); §95111(i))
 - CH₄ and N₂O for all facilities; CO₂ for biomass, municipal solid waste, geothermal

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Appendix A: Emission Factors and Methods to Support Reporting

- What is included?
 - Unit conversions
 - Global warming potentials
 - Method for approximating emissions based on amount of fuel used
 - Emission Factors
 - EPA method for determining emissions of high global warming potential compounds

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Primary Sources

- US Environmental Protection Agency & Energy Information Administration
 - Default CO₂ Emission Factors
 - Default Carbon Contents
 - Default Heat Contents
- Intergovernmental Panel on Climate Change
 - Global Warming Potentials
 - Default CO₂ Emission Factors
 - Default N₂O & CH₄ Emission Factors by Fuel Type

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Overview of CO₂ Emission Calculation Methods

- 95125(a)
 - Emissions = Fuel Mass or Volume x Default Heat Content x Default Emission Factor
- 95125(c)
 - Emissions = Fuel Mass or Volume x Measured Heat Content x Default Emission Factor
- 95125(d)
 - Emissions = Fuel Mass or Volume x Measured Carbon Content
- 95125(e)
 - Employs Measured Heat and Measured Carbon Content

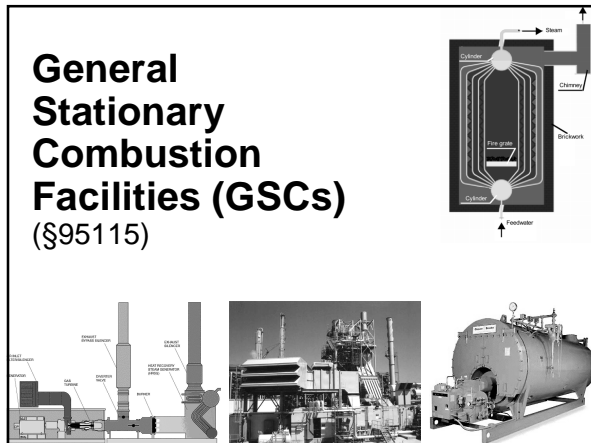
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Comments on general reporting requirements?



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General Stationary Combustion Facilities (GSCs) (§95115)



GSC Facilities Overview

- 25,000 metric tonnes CO₂ (stationary combustion)
 - Facility threshold
 - Does not include process, mobile, indirect electricity or fugitive emissions
- Reporting from many different sectors
- Requirements separate from refineries, power, cogeneration, and cement sectors
- Threshold consistent with EU reporting

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Major GSC Sectors Affected

(only if ≥ 25,000 metric tonnes/yr CO₂ from combustion)

- | | |
|-----------------------------|---------------------|
| ■ Natural gas transmission | ■ Oil production |
| ■ Industrial gases | ■ Food processing |
| ■ Paperboard manufacture | ■ Steel foundries |
| ■ Colleges and universities | ■ Mineral processes |
| | ■ Glass container |
| | ■ Malt beverages |

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How Will You Know If You Are a GSC Facility?

- ARB is working to ensure all ≥25,000 metric tonnes GSC facilities know of requirements
- Fuel usage can be used to quickly approximate CO₂ emissions
 - Appendix A provides fuel usage and emissions factors to estimate CO₂ emissions

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GSC Reporting Requirements

- Stationary combustion – choice of:
 - Calculate from fuel use and default emission factors (§95125(a)-(b))
 - Calculate using heat value or carbon content (§95125(c)-(d), (h))
 - Continuous monitoring if available (§95125(g))
- Oil and gas production sources test fuel
- Report indirect energy use in KWh, Btu
- Cogeneration as specified in §95112
- Electric generation as specified in §95111

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Approximating Emissions Based on Amount of Fuel Used

Fuel Type	Fuel Units	Kg CO ₂ /Unit	Amount of fuel to produce 25,000 MT CO ₂	Amount of fuel to produce 2,500 MT CO ₂
Natural Gas ¹	SCF	0.05	459,140,464	45,914,046
LPG (energy use)	Gal	5.79	4,317,757	431,776
Distillate Fuel	Gal	10.14	2,466,011	246,601
Motor Gasoline	Gal	8.80	2,841,174	284,117
Landfill Gas	MMBtu	52.03	480,503	48,050
Coal ²	Short Ton	2,082.89	12,003	1,200
Jet Fuel	Gal	9.56	2,614,682	261,468
Kerosene	Gal	9.75	2,562,972	256,297
Petroleum Coke	MMBtu	102.04	244,996	24,500
Crude Oil	Gal	10.29	2,430,348	243,035

¹Unspecified²Unspecified Other Industrial

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GSC Reporting Deadlines

- Data reports for GSCs due each April 1, beginning in 2009 for 2008 emissions
- Verification required on triennial schedule, due October 1 beginning 2011 for 2010 reported data
 - Except oil and gas production -- annual verification begins in 2010 for 2009 reported emissions

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Cessation of GSC Reporting

- Can cease reporting if for 3 consecutive years, CO₂ emissions drop below 20,000 MT ((§95103(e))
- Facility is subject again to reporting if it exceeds 25,000 MT CO₂ from stationary combustion

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Comments on requirements for GSC facilities?



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Cement Plants

(§95110)



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Cement Plants: Who Would Report

- Operators of Cement Plants
- Primarily Manufacturing Cement
- Eleven Total in California
- Updated Definition
 - NAICS Code 327310



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Cement Plants: Updated Definitions

- Calcination
 - Specified calcium oxide rather than clinker
- Cement
 - Eliminated reference to finish mixing
- Cementitious product
 - Added fly ash, slag, and other pozzolans

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§95110. Data Requirements and Calculation Methods

- a) Greenhouse Gas Emissions Data Report
- b) Calculation of CO₂, N₂O, and CH₄ Emissions
- c) Process CO₂ Emissions from Cement Manufacturing
- d) Stationary Combustion CO₂ Emissions
- e) Efficiency Metrics

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§95110(a) Greenhouse Gas Emissions Data Report

- 1) Total Emissions (metric tonnes)
 - CO₂, CH₄, and N₂O
 - 2) Process CO₂ Emissions
 - 3) Stationary Combustion
 - 4) Fugitive Emissions
 - 5) Indirect Energy Usage
 - 6) Efficiency Metrics
- Examples of Reported Information
 - Quantity of clinker produced (metric tonnes)
 - Fuel consumption by fuel type (scf, gallons, or tons)
 - Coal consumption by coal type (tons)

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§95110(b) Calculation of CO₂, N₂O, and CH₄ Emissions

- 1) Total CO₂ Emissions – Proposed Approach
 - A. Continuous Emissions Monitoring Systems (CEMS), **OR**
 - B. Process and Stationary Combustion CO₂ Emissions
- 2) Direct N₂O and CH₄ Emissions
- 3) Direct Fugitive Emissions – Updated Emission Factors
- 4) Indirect Energy Usage
- 5) Cogeneration
- 6) Efficiency Metrics – Added second metric

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§95110(c) Process CO₂ Emissions from Cement Manufacturing

- 1) Clinker-Based Methodology
 - A. Clinker Emission Factor (EF_{Cli})
 - Measured annually
 - Excludes imported non-carbonate sources
 - B. CKD Emission Factor (EF_{CKD})
 - No changes
- 2) Total Organic Carbon (TOC)
Content in Raw Materials
 - Assumed 0.2% TOC in Raw Material

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§95110(d) Stationary Combustion CO₂ Emissions

- Measured Carbon Content
 - Coal or Petroleum Coke
 - Monthly Measurement, Composite of Weekly Samples
- Measured Heat Value or Carbon Content
 - Other Fossil Fuels
 - Landfill Gas or Biogas
 - Alternative Fuels
- Default or Source Specific Emission Factors
 - Co-Firing Biomass and Fossil Fuels
 - Biomass or Municipal Solid Waste
- Default Emission Factors for Start-Up Fossil Fuels

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§95110(e) Efficiency Metrics

Unchanged Method

- 1) CO₂ Emissions per metric tonne of Cementitious Product

Proposed Additional Metric

- 2) CO₂ Emissions per metric tonne of Clinker
 - Clinker consumed, added to stock, or sold

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Review of Cement Plants

- Proposed Approach
 - Consistent with CCAR Cement Protocol
 - Clinker-Based Method is Good Practice
 - Plant-specific Emission Factors
 - Stationary Combustion Emissions Using Measured Data
 - Efficiency Metrics
 - Complete Inventory of Cement Plant Emissions

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Cement Plant Reporting Deadlines

- Data reports due each June 1, beginning in 2009 for 2008 emissions
- Verification required on triennial schedule, due December 1 beginning 2010
 - Change in materials or operations that require permit change
 - Emissions data report shall be verified the following calendar year

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Comments on Cement Plant Proposals?



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Petroleum Refining, Hydrogen Plants, Oil and Gas Production

(§95113, 95114, 95115(b))



Refining Sector Basics

- Annual reporting and verification on a facility basis
- Stationary combustion, process, fugitives
- Gases as specified in the regulation
 - CO₂, CH₄, N₂O
- Cogeneration; indirect energy use
- Report emissions by June 1
- Verification by December 1

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Stationary Combustion – CO₂

- Refinery Fuel Gas
 - Calculate a fuel specific EF
 - Hourly average HHV, CC daily
 - Use EF and daily average HHV to calculate CO₂ emissions
- Natural Gas
 - Stationary combustion - CO₂ monthly using measured HHV and default EF when HHV range is 975-1100 Btu/scf

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Asphalt Production

- August 10 draft method has been modified to recognize the fact that emissions are “controlled”
- Calculate CO₂ and CH₄ emissions
- Use default emission factor (2,555 scf CH₄/10⁶ bbl)
- Assume destruction efficiency of 98%

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Sulfur Recovery – CO₂

- Default molar fraction CO₂ to SRU = 20%
- Recognizing
 - There are numerous feeds to SRUs
 - Feed carbon content may vary significantly
 - Default value may not be applicable in all situations
- Option has been included to allow determination of specific carbon content value(s) using source test(s)
- Source test ARB approved and conducted under supervision of ARB or AQMD/APCD

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Hydrogen Production Facilities

- Operational control determines whether hydrogen plants report as part of a refinery, or a stand-alone entity
- Report
 - Fuel and feedstock consumption, hydrogen production, transportation hydrogen sales
 - Stationary combustion and process emissions – CO₂, CH₄, N₂O
 - Fugitive emissions
 - Flaring emissions
 - Process vent emissions
 - Sulfur recovery emissions
 - Cogeneration emissions; indirect energy purchases

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Hydrogen Plants - Combustion and Process Options

- CEMS – must be installed and operated as per 40 CFR Part 75
- Fuel and Feedstock Mass Balance – “S” Factor for emissions accounted for elsewhere
- Combustion and process calculated separately – “S” factor applicable

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Hydrogen Plants – Transferred CO₂

- Transferred CO₂ – not directly emitted but sold and transferred out of the installation (e.g., food grade CO₂ for beverages)
- Transferred CO₂ to be reported but not subtracted from emissions report
 - This regulation defines accounting methodologies
 - This regulation does not define avoided or offset emissions

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Exploration and Production Facilities

- Subject to reporting as a major source with emissions over the 25,000 metric ton threshold
 - Combustion sources only
 - Process, fugitives will be added later
- Associated gas
 - Regulatory proposal requires fuel-specific emission factor (like refineries)
 - Invite comment on alternative: Monthly measured HHV if $975 < \text{HHV} < 1100$; monthly carbon content if outside range

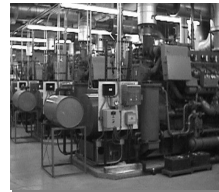
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Comments on Refineries, Oil/Gas Production or Hydrogen Plants?



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Cogeneration Facilities (§95112)



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Cogeneration Facilities: Who Would Report

- Operators of Cogeneration Facilities
- Nameplate Generating Capacity ≥ 1 MW
- Annual CO₂ Emissions $\geq 2,500$ metric tonnes
- Updated Applicability
 - All facilities shall meet generating capacity and emissions threshold for reporting to be required

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Cogeneration Facilities: Updated Definitions

- Cogeneration Facility
 - Industrial structure, installation, plant, building, or self-generating facility
 - Sequential generation of multiple forms of useful energy in a single, integrated system.
- Topping Cycle Plant
 - Energy input used to produce useful power output
 - Reject heat used to provide useful thermal energy
- Bottoming Cycle Plant
 - Energy input applied to useful thermal energy
 - Reject heat used for power production

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§95112 Data Requirements and Calculation Methods

- a) Greenhouse Gas Emissions Data Report
 - Information to Submit Each Report Year
 - Total Emissions for Each GHG
 - Summary of Emissions by Source
 - Data Used to Calculate Emissions
- b) Calculation of CO₂, N₂O, and CH₄ Emissions
 - Methods to Calculate Emissions

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§95112(a) Greenhouse Gas Emissions Data Report

- 1) Facility Level and Generating Unit Information
 - 2) Cogeneration System
 - 3) Electricity Generation
 - 4) Thermal Energy Production
 - 5) Distributed Emissions
 - 6) Indirect Electricity Usage
- Examples of Reported Information
 - Nameplate generating capacity (MW)
 - Prime mover
 - Electricity consumed on-site (kWh)
 - Useful thermal output (MMBtu)
 - Efficiency of electricity generation (percent)

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§95112(b) Calculation of CO₂, N₂O, and CH₄ Emissions

- 1) CO₂ Emissions from Stationary Combustion
 - 95111 (c)
- 2) GHG Emissions from Processes and Fugitive Sources
 - 95111 (e) – (h)
- 3) N₂O and CH₄ Emissions from Stationary Combustion
 - 95125 (b)
- 4) Distributed Emissions
 - 95112 (b) (4)
 - A. Topping Cycle Plants
 - B. Bottoming Cycle Plants

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§95112(b)(4) Distributed Emissions

- Topping Cycle Plants
 - Efficiency Method
 - Distributed between Thermal Energy and Electricity Generation
- Bottoming Cycle Plants
 - Detailed Efficiency Method
 - Distributed between Manufactured Products, Thermal Energy, and Electricity

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§95112(b)(4) Distributed Emissions

- Proposed Approach
 - Relies on Registry Efficiency Method
 - Assumed Efficiency Values
 - Does not include Facility-Specific Thermal Energy Efficiency Equation
 - Option to Calculate Facility-Specific Electricity Generation Efficiency
 - Built-in Flexibility
 - Equitable Approach

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Cogeneration Facilities Reporting Deadlines

- Data reports due each April 1, beginning in 2009 for 2008 emissions
- Verification required on annual schedule, due October 1 beginning 2010

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Cessation of Cogeneration Facility Reporting

- Can cease reporting if for 3 consecutive years, CO₂ emissions drop below 2,000 MT (§95103(e))
- Facility is subject again to reporting if it exceeds 2,500 MT CO₂ from stationary combustion

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Comments on cogeneration facilities?



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Verification

(§95130-95133)

- Requirements
- Accreditation
- Conflict of Interest



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Why Verification?

- The Act requires it
- Expected under international standards
- Experience with voluntary reporting shows the need
- Complex nature of emissions estimation
- Critical for credibility of program

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Who Verifies?

- Air districts and consulting firms become verification bodies
 - Subject to ARB training and oversight
- Operator selects verification body
- Verification body selects specialized verification team appropriate to facility type
 - Includes auditing and engineering skills

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Verification

- Annual third-party verification for:
 - Refineries
 - Hydrogen plants
 - Oil and gas production facilities
 - Retail providers and Marketers
 - Power plants and cogeneration facilities ≥ 10 MW (except pure biomass)
- Triennial third-party verification for other sources

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Third Party Verification

- Consistent with existing standards, including ISO
 - Already required for CCAR members
- Third party verifiers will help assure data quality
- Verifiers to be trained under ARB approved curriculum
 - Demonstrate expertise
 - Consistency in verification

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Verification Services

- Verification Plan
- Site visits to identify sources and review data management systems
- Sampling Plan
 - Assess uncertainty risk of data management system, data acquisition equipment, emissions calculations
 - Ranking of most significant and uncertain sources
- Data checks focus on areas with high risk of uncertainty as determined in sampling plan

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Verification Services

- Comparison of verifier data checks with reported data
- Overall differences exceeding 5 percent considered significant
- Verification products
 - Detailed report to facility
 - Verification opinion to both facility and ARB

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Accreditation: Verification Bodies

- Only an accredited verification body may conduct verification and submit a verification opinion.
 - Two lead verifiers
 - At least five total staff
 - Professional liability insurance
 - May subcontract with other ARB-accredited verifiers to establish verification teams
- Air Districts welcome as verification bodies when specified qualifications are met -- may offer verification services for a service fee.

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Accreditation: Lead Verifiers

- Lead verifier in good standing under CCAR or UKAS, or accredited in ISO 14065, ISO 14064, ISO 19011, and completed 3 verifications by 12/31/07; or,
- 2 yrs as ARB accredited verifier, completed 3 verifications as an apprentice lead, and had favorable assessment; or,
- Project manager or lead developing GHG or emissions related inventories for 4 yrs, 2 yrs may be graduate level work.
- All must take State approved verification training and pass an exit exam, additional 'auditing' training when specified.

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Accreditation: Verifiers

- Bachelor's level degree: science, technology, statistics, business, environmental policy, mathematics, financial auditing or economics
 - Or, work experience that provides technical skills to do verification
- 2 yrs in professional role in emissions management, technology, or other technical field with skills to conduct verification
- Must take part in ARB approved verification training and pass an exit exam

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Conflict of Interest

- **Term Limit**
 - Verifiers to be changed after 6 years of verification services (two cycles)
 - Allowed to resume with client after 3 years off (one cycle)
- **Conflict of Interest Policy**
 - Verification body and verifier may not provide both consulting and verification services within a 3-year period.

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Pre-verification Process

- ARB will approve verification teams before verification activities take place.
- Teams must demonstrate acceptable level of conflict-of-interest and expertise for verifying the type of facility they contract with.
- Team must include a specialist for retail provider, marketer, petroleum refinery, hydrogen plant, cement plant.

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Verification Oversight

- ARB staff responsible for enforcing regulation
- Verification process will assist compliance efforts
- Targeted review of submitted data and verifiers

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Verification Comments?



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Electric Generating Facilities, Retail Providers, and Marketers

(§95111)



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Who Would Report

- Operators of Electric Generating Facilities ≥ 1 MW and $\geq 2,500$ MT of CO₂ per year
 - Fossil Fuels, Landfill Gas, Biogas, Biomass, Municipal Solid Waste, Geothermal
- Retail Providers
 - IOUs, POUs, ESPs, CCAs, multi-jurisdictional utilities, WAPA, DWR
- Marketers

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Reporting Schedules

- April 1 – generating facilities
 - Unless operated by retail provider
- June 1 -- Retail providers and marketers
 - Including generating facilities operated by retail providers

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Verification Schedules

- Annually 6 months following reporting due date
- Exception -- Triennially beginning with 2010 report (2009 data) for
 - Pure biomass (97%)
 - Generating facilities < 10 MW

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Generating Facilities Would Report

- Nameplate Generating Capacity (MW)
- Annual Net Power Generation (MWh)
- Annual Fuel Consumption by Fuel Type
- Annual CO₂, N₂O, CH₄ from Fuel Combustion
- CO₂ from Acid Gas Scrubbers
- CH₄ from Coal Storage
- HFCs from Cooling that supports power generation
- CO₂ from Geothermal
- Wholesale Sales Exported Out-of-State (MWh) when known
- *Heat and Carbon Content when measured*
- *SF₆ from equipment located at facility*

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Generating Units Would Report

- Nameplate Generating Capacity (MW)
- Annual Net Power Generation (MWh)
- Annual Fuel Consumption by Fuel Type
- Annual CO₂, N₂O, CH₄ from Fuel Combustion
- *Wholesale Sales Exported Out-of-State (MWh) when known, if applicable*

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Optional Reporting

- Aggregation of Multiple Units
- Operators of Out-of-State Facilities
- Asset Owning/Asset Controlling Suppliers

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Retail Providers and Marketers

- Fugitive SF₆ from Transmission and Distribution facilities
- Power Imported (MWh)
- Power Exported (MWh)
- Power Wheeled Through California (MWh)
- Null Power

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Retail Providers -- Additional

- Facility level and generating unit Information
- Net generation for nuclear, hydro, wind, or solar generating facilities they operate
- Retail sales
 - Multi-jurisdictional report ratio
 - Green retail sales (optional)
 - Retail sales for electrification projects (optional)
- Power purchased or taken from in-state specified and unspecified sources (MWh)
- Wholesale sales from power purchased or taken from specified and unspecified sources and sold to in-state entities

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Retail Providers -- Additional

- Native load designations (Optional)
- For nuclear or hydro > 30 MW
 - Power purchased with contract prior to January 1, 2008
 - Power purchased without such contract
- Ownership shares in generating facilities

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Retail Providers -- Additional

For facilities with CO₂ emissions > 1,100 lbs/MWh

- Ownership share differential (OSD)
 - OSD = 0.9 * (Ownership share) * (net generation) – power taken
- Adjusted ownership share differential (AOSD)
 - Wholesale sales met criteria
 - Power could not be delivered
 - Power was not needed
 - Reduced demand resulted in reduced generation

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Methodologies CO₂ from Fuel Combustion

- Natural Gas
 - 40 CFR Part 75 emissions
 - Monthly heat content or monthly carbon content or CEMS for others
- Coal and Petroleum Coke
 - 40 CFR Part 75 emissions (including Appendix G)
 - Monthly carbon content or CEMS for others
- Middle Distillates, Residual Oil, LPG
 - 40 CFR Part 75 emissions
 - Per delivery/monthly heat content or monthly carbon content or CEMS for others

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Methodologies CO₂ from Fuel Combustion

- Landfill gas or biogas
 - **Monthly** heat content, monthly carbon content or CEMS
- Biomass or MSW
 - If available, CO₂ CEMS and flue gas flow meter
 - Default emission factor method
 - **ARB approved source-specific emission factors**
- Geothermal
 - Default emission factor method (note errata)
 - **ARB approved source-specific emission factors**
- Start-Up fuels for biomass facilities
 - Default emission factor

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Other Methods

- N₂O & CH₄ from Fuel Combustion
 - Default emission factors or
 - **ARB source-specific emission factors**
- ASTM D6866 to determine biomass-derived portion of MSW
- Fugitive SF₆ and HFCs
 - Mass Balance
 - **HFC service logs for individual units**

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Questions on Electric Power Sector Reporting Requirements?



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Next Steps

- Collect comments on proposal
- Board Hearing December 6
 - Receive public testimony
 - Consider staff proposal
- Board Hearing in El Monte (Southern California)



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Submitting Comments



- Submit formal comments on proposal at:
<http://www.arb.ca.gov/lispub/comm/bclist.php>
 - Includes mechanism for providing attachments
- Comments required by December 5, 2007, 12:00 Noon unless provided at Board meeting (recommend earlier submittal, please)
- Staff Report and Regulation:
<http://www.arb.ca.gov/regact/2007/GHG2007/GHG2007.htm>

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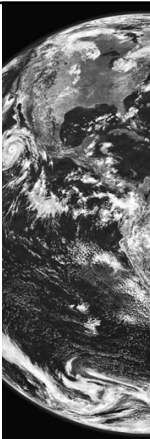
Robert Jenne – Legal Counsel
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GHG Mandatory Reporting Website
<http://www.arb.ca.gov/cc/ccei/ccei.htm>



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Thank you for
attending.

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